

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

AMAZON.COM, INC. and AMAZON DATA
SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR
COMMERCIAL PARTNERS; BRIAN
WATSON; STERLING NCP FF, LLC;
MANASSAS NCP FF, LLC; NSIPI
ADMINISTRATIVE MANAGER; NOVA
WPC LLC; WHITE PEAKS CAPITAL LLC;
VILLANOVA TRUST; CASEY
KIRSCHNER; ALLCORE DEVELOPMENT
LLC; FINBRIT HOLDINGS LLC;
CHESHIRE VENTURES LLC; CARLETON
NELSON; JOHN DOES 1-20,

Defendants.

CASE NO. 1:20-CV-484-RDA-TCB

800 HOYT LLC,

Intervening Interpleader
Plaintiff / Intervening
Interpleader Counter-
Defendant,

v.

BRIAN WATSON; WDC HOLDINGS, LLC;
PLW CAPITAL I, LLC; BW HOLDINGS;
LLC,

Interpleader Defendants,

and

AMAZON.COM, INC., and AMAZON DATA
SERVICES, INC.,

Interpleader Defendants /
Interpleader Counter-Plaintiffs.

**JOINT MOTION TO RESCHEDULE RESPONSE DEADLINES AND HEARING ON
PLAINTIFFS' MOTION FOR LEAVE TO FILE THIRD AMENDED COMPLAINT**

Plaintiffs Amazon.com, Inc. and Amazon Data Services, Inc. (collectively, “Amazon”) and Defendants Brian Watson, WDC Holdings LLC dba Northstar Commercial Partners, NSIPI Administrative Manager, Sterling NCP FF, LLC, Manassas NCP FF, LLC, Casey Kirschner, Carleton Nelson, and Cheshire Ventures LLC (collectively, the “Parties”) jointly move the Court to reschedule Defendants’ deadline to respond to and the hearing on Plaintiffs’ Motion for Leave to File a Third Amended Complaint (the “Motion”).

Plaintiffs initially noticed a hearing on the Motion for April 15, 2022, *see* Dkt. 620, and the Court subsequently rescheduled the hearing for April 22, 2022, *see* Minute Order (Apr. 4, 2022). The Parties have since met and conferred via e-mail regarding the date of the hearing. The Parties have scheduled the deposition of D. Matthew Doden for Tuesday, April 19. And the Parties have agreed that the time for Defendants to respond to Plaintiffs’ motion should be extended until April 22, 2022, and Plaintiffs’ reply to April 29, 2022. Moreover, as the Court is aware, lead counsel for Defendant Brian Watson, Stanley Garnett, is travelling out of the country on Friday, April 29, 2022 and would be unable to attend an April 29 hearing of the motion.

Accordingly, given these circumstances, the Parties respectfully request that the Court: (1) order that Defendants’ deadline to respond to the Motion shall be **Friday, April 22**; (2) order that Plaintiffs’ deadline to file a reply in support of the Motion shall be **Friday, April 29**; and (3) reschedule the hearing on the Motion to **Friday, May 6, 2022**.

Dated: April 12, 2022

Veronica S. Moyé (*pro hac vice*)
GIBSON, DUNN & CRUTCHER LLP
2001 Ross Avenue, Suite 2100
Dallas, TX 75201
Telephone: (214) 698-3100
Facsimile: (214) 571-2900
vmoye@gibsondunn.com

Respectfully submitted,

/s/ Michael R. Dziuban
Elizabeth P. Papez (*pro hac vice*)
Patrick F. Stokes (*pro hac vice*)
Claudia M. Barrett (*pro hac vice*)
David W. Casazza (*pro hac vice*)
Michael R. Dziuban (Va. State Bar No. 89136)
GIBSON, DUNN & CRUTCHER LLP

1050 Connecticut Avenue, N.W.
Washington, D.C. 20036-5306
Telephone: (202) 955-8500
Facsimile: (202) 467-0539
epapez@gibsondunn.com
pstokes@gibsondunn.com
cbarrett@gibsondunn.com
dcasazza@gibsondunn.com
mdziuban@gibsondunn.com

Counsel for Plaintiffs Amazon.com, Inc. and Amazon Data Services, Inc.

Stanley L. Garnett
Justin L. Cohen
Amanda K. Houseal
Brownstein Hyatt Farber Schreck LLP
410 Seventeenth St., Suite 2200
Denver, CO 80202-4432
sgarnett@bhfs.com
jcohen@bhfs.com
ahouseal@bhfs.com

/s/ Jeffrey Hamlin
George R. Calhoun
Jeffrey Hamlin
James M. Trusty
Ifrah Law, PLLC
1717 Pennsylvania Ave, N.W. Suite 650
Washington, DC 20006
george@ifrahlaw.com
jhamlin@ifrahlaw.com
jtrusty@ifrahlaw.com

*Counsel for Defendants Brian Watson, WDC Holdings, LLC, NSIPI Administrative Manager,
Sterling NCP FF, LLC, Manassas NCP FF, LLC*

/s/ Rachel Friedman
Alex Little
Rachel Friedman
Burr & Forman LLP
222 Second Ave. South, Suite 2000
Nashville, TN 37201
Alex.little@burr.com
rfriedman@burr.com

/s/ Casey Kirschner
Casey Kirschner (via U.S. mail)
635 N. Alvarado Lane
Plymouth, MN 55447
Casey.kirschner@gmail.com

Pro se

Counsel for Carleton Nelson and Cheshire Ventures

CERTIFICATE OF SERVICE

I hereby certify that on April 12, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system. I will then send the document and a notification of such filing (NEF) to the following parties via U.S. mail to their last-known address and by email, where noted:

Casey Kirschner
635 N. Alvarado Lane
Plymouth, MN 55447
By email: casey.kirschner@gmail.com

s/ Michael R. Dziuban
Michael R. Dziuban
GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036-5306
Telephone: (202) 955-8500
Facsimile: (202) 467-0539
mdziuban@gibsondunn.com

*Counsel for Plaintiffs Amazon.com, Inc. and Amazon
Data Services, Inc.*